

**REMARKS**

Reconsideration of the above-identified application in view of the present amendment is respectfully requested.

**Objection to Claim 3**

The Office Action noted some confusion in the language of claim 3. Claims 1 and 3 - 5 have been amended to clarify the language of the claims. It is respectfully submitted, however, that claim 3 is consistent with Fig. 1 and the cited portion of the specification. As illustrated in Fig. 1, the signals received at each of the plurality of antennas (S1 - S3) are provided to a combining element 16 to produce a combined signal. The combined signal is then provided to separator circuit 18 that distributes the combined signal to the various receivers 22 and 24. The separator circuit does not split the combined signals into its constituent signals, but instead simply provides the combined signal to each receiver. To clarify this point, the paragraph in question has been amended to specify that the combined signals are distributed to the receiving devices. It is therefore respectfully requested that the objection be lifted.

**Claims 1 - 5**

The Office Action requests that the patentability of claims 1 - 5 be demonstrated in light of the teachings of U.S. Patent No. 6,091,717 to Honkasalo et al. (hereinafter: Honkasalo). Honkasalo describes a method for scheduling packet data transmissions that allocates channels among

various mobile devices in a code division multiple access arrangement. In the Honkasalo system, a given base station can allocate access among a plurality of mobile devices by assigning access rights, or tokens, to the mobile devices over an MAC channel. When a mobile device is assigned a token, it can transmit data to the mobile station over a time period associated with the token. As part of a hand-off protocol described in Honkasalo, a mobile device can receive tokens from multiple base stations when it is between the coverage areas of the stations. In this case, the mobile device transmits to the base station offering the best quality channel, with quality being described as the lowest bit or frame error rate.

Claim 1 recites a system for the terrestrial transmission of digital signals in accordance with the MPEG2-TS and DVB-T standard and for carrying information for synchronization in accordance with the TS 101 191 standard. N transmitters, where N is an integer greater than one, operate respectively at N different frequencies. Each transmitter receives a same digital signal to send in the form of packets in accordance with the MPEG2-TS standard. N receivers operate respectively at N frequencies. Each receiver supplies a succession of packets in accordance with the MPEG2-TS standard. N error detection devices detect errors in the packets supplied by each receiver. N synchronization devices synchronize the packets supplied by each receiver. A device selects one

packet among the N available packets that corresponds to the lowest error rate.

It is respectfully submitted that Honkasalo does not teach or suggest all of the elements of claim 1. Specifically, Honkasalo does not teach or suggest a plurality of transmitters that broadcast the same digital signal on different frequencies. While all of the mobile devices and base stations contain both transmitters and receivers, as noted in the Office Action, there is no teaching or suggestion in Honkasalo that they operate in concert to broadcast the same digital signal. In fact, in the cellular system described in Honkasalo, the mobile stations would be expected to operate independently of one another, while the base stations essentially act as routers for the mobile stations. In no case would they be expected to receive and transmit a common digital signal in the sense intended by Claim 1.

Further, Honkasalo does not teach or suggest a device that selects a packet from a plurality of packets according to its associated error rate. The device of the present invention reviews multiple copies of data received from a plurality of transmitters. The device operates within a receiver to select between multiple, frequently diverse transmissions of one packet of data according to which transmission produced a packet of the highest quality. It will be appreciated that all of the frequency channels of the present invention are utilized, regardless of their quality. Honkasalo, on the other hand, teaches monitoring two available channels prior to transmission to determine to which base

station it should transmit a given block of data. In this case, only one instance of the data will be transmitted along a single frequency. It is respectfully submitted that Honkasalo does not teach all of the limitations of Claim 1, and the withdrawal of the rejection is respectfully requested.

Turning to the claims depending from claim 1, in the interest of brevity, some claims will not be discussed separately. The applicants submit, however, that each of claims 2 - 5 is distinguishable over Honkasalo for the reasons discussed above under claim 1 and for their own unique limitations.

Claim 2, which depends from claim 1, further recites N transmission antennas located at different positions with each receiving an output signal from one of the N transmitters. It is respectfully submitted that Honkasalo does not teach N spatially diverse antennas broadcasting a common digital signal on different frequencies. While the mobile devices and base stations of Honkasalo each have associated antennas, it is respectfully submitted that their associated transmitters do not broadcast a common digital signal, as described above. Accordingly, it is respectfully submitted that Honkasalo does not teach or suggest the elements of Claim 2.

Claim 3, which depends from claim 1, further recites P receiving antennas, where P is an integer greater than one, which are located at different positions. A device combines signals received by the antennas to supply a combined signal.

A device distributes the combined signal among the N receivers. It is respectfully submitted that Honkasalo contains no teaching or suggestion of combining signals received at a plurality of spatially separated antennas and then distributing the combined signals to a plurality of receivers.

In view of the foregoing, it is submitted that Applicant's claim 1, and its dependent claims 2-5 define patentable invention over the teachings of Honkasalo.

**Claims 9 - 11**

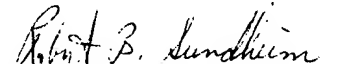
The Examiner's indication that claims 6 - 8 contain allowable subject matter is acknowledged with appreciation. Claim 6 has been rewritten in independent form as Claim 9, which includes the combined elements of claims 1, 4, and 6. Claim 7 has been rewritten as claim 10. Claim 8 has been rewritten in independent form as claim 11, which incorporates the limitations of claims 1 and 8. It is respectfully submitted that claims 9 - 11 are allowable over the cited art.

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In view of the foregoing, it is submitted that this application is now in condition for allowance with respect to claims 1 - 5 and 9 - 11.

Please charge any deficiency or credit any overpayment in the fees for this amendment to our Deposit Account No. 20-0090.

Respectfully submitted,

  
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AMENDMENT TO SPECIFICATION WITH MARKED CHANGES:

The paragraph beginning on page 4, line 15 has been amended as follows:

The P=3 receiving antennas S1, S2, and S3 receive signals from each of the antennas 14A and 14B, and the detected signals are combined in a combining circuit 16. The combined signals are applied to a separator circuit 18 which distributes the combined signals to the receiving devices 22 and 24.